



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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1103580 - R8 SDMS

Re: 8ENF-RC

April 17, 2008

Mr. Iver Johnson
Hazardous Waste Section
Waste & Underground Tank
Management Bureau
Montana Dept. of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

Re: 2008 Cleaning and Demolition Project Work Plan
Asarco East Helena Plant, March 12, 2008

Dear Mr. Johnson:

Thank you for allowing EPA to review and provide comment on the 2008 Cleaning and Demolition Work Plan for the Asarco East Helena Plant. We have the enclosed comments, which were previously transmitted to you via electronic mail. Please incorporate these into your comments to the facility, as you deem appropriate. I may be reached at (303) 312-6503, if you have questions on the enclosed comments or any related matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Jacobson".

Linda Jacobson, EPA Project Manager
RCRA Enforcement

Enclosure

cc: Denise Kirkpatrick, MDEQ



2008 CLEANING AND DEMOLITION PROJECT
ASARCO EAST HELENA PLANT

Page 2 of 9 and 4 of 9, and page 16 of 23, EPA will not be approving implementation of the February 13, 2008 Cover System Design Report and has directed the company to install temporary covers over the demolition footprint areas, as necessary during the 2008 demolition season.

Page 5 of 9, Section 4.4, and page 17 of 23, it is recommended that the temporary covers be anchored with something more sturdy than sand bags.

Page 4 of 23, Site security, where facility structures are removed, permanent fencing should be installed rather than caution tape, delineators, etc.

Page 6 of 23, Section 1.6, Temporary Conveyance Systems for Surface Water, please identify which existing collection trenches and sumps will be used during decon activities. The contractor should ensure that any collected solids are removed at the conclusion of the 2008 season. Asarco should ensure that their wastewater permit allows treatment of this contaminated water.

Page 6 of 23, Section 2.0, the text should indicate where the universal wastes, PCB and non-PCB ballasts and mercury containing equipment will be stored and who will inspect and dispose of it.

Page 7 of 23, in the second full paragraph, demolition of the flues is being conducted pursuant to a separate work plan, so an explanation here of how that "cohesive area unit with like contamination" will be addressed would be beneficial or remove this reference to the flue. Last paragraph, this should be removed from this work plan and included in the EPA flue demolition work plan, including special pre-cleaning procedures.

Page 8 of 23, Section 2.2, the text should specify where the 55-gallon drums of sludge removed by triple-rinsing of the acid tanks will be disposed. This waste should be tested for pH and neutralized if necessary.

Page 8 of 23, Section 2.2, Asarco should confirm that their wastewater treatment system permit allows acceptance of the cleaning and washing waters from the acid tanks.

Page 8 of 23, Section 2.4, Removal of Oils from Site Equipment (if Discovered), the text should indicate where the removed oils will be stored and labeled and who will be responsible for ultimate disposal.

Page 13 of 23, the bag house flue and monier flue demolition are subject to the EPA work plan and descriptions of their demolition should be removed from this plan.

Page 15 of 23 and 17 of 23, Equipment, EPA has Concerns with the use of 25 to 35 ton rock trucks, side dump trucks, and/or 10-wheel dump trucks within the CAMU cell. The company needs to ensure that wastes hauled to the CAMU in this size vehicle are not allowed to drive on

the cell but merely dump the loads for placement in the cell by appropriately weighted and sized equipment.

Page 15 of 23, use of a water truck to wet haul routes for dust control was not anticipated during CAMU operation [please refer to Appendix E of the CAMU design, Section 3.7.1]. We question the necessity of water trucks, since street sweepers are to be used to clean up dust and debris, and are concerned with infiltration impacts to the existing groundwater plumes from wetting these highly contaminated areas. We request reconsideration of this proposal and adherence to the CAMU Operating Plan.

Pages 15 and 16 of 23, Section 5.6, Plug and Abandon Underground Piping, this is a corrective action activity and should be removed from this demolition work plan. Further, since temporary rather than the interim permanent cap will be placed, this activity may not be conducted in 2008.

Page 16 of 23, Section 5.7, last paragraph, first sentence, the blast furnace flue is a portion of the EPA work plan.

Page 18 of 23, Section 6.1, Application with Water During Demolition, please see prior concerns for infiltration impacts from keeping all work areas wet with 2000-gallon water trucks. URS also anticipates use of a Dust Boss, which can "drive it to the ground".

Page 21 of 23, Section 7.2, Description of Solid Waste Disposal Options, the list should be expanded to discuss non-CAMU-eligible solid and hazardous wastes, including used oil, PCB ballasts, and universal wastes.

Page 22 of 23, Section 7.4, Labeling of Waste, for containers, labeled as "Non-Classified Waste Material; Laboratory Analysis in Progress", the label should also include a date. The text should be amended to specify an allowable time for a hazardous waste determination and appropriate disposal. The text should also indicate whether URS or Asarco will be the identified generator of the waste drums.

Page 22 of 23, Management of CAMU Approved Waste, the text should specify that the CAMU lifts will be applied with appropriate equipment as detailed in Appendix J, Specifications, of the CAMU design document.

Figures 2, 3, 8, 10, 12, 13 should be modified to remove the blast furnace flue and Moniér flue portions since they are not part of this state work plan or designate on these that this demolition work is subject to approval under an EPA work plan.

Figure 7, flow filling of underground utilities is a corrective action activity. The text and figure describing this work should be removed from the state work plan.

Figure 14, an interim permanent cap is not to be installed this year. EPA suggests more sturdy anchoring methods for temporary caps than placement of sand bags.

2008 Schedule, the schedule should be amended to remove activities relating to the interim permanent cap.